REMARKS

I. Introduction

Claims 1-34 are pending in the present application. Claims 20-31 have been withdrawn in response to a restriction requirement. In a March 22, 2005, Office Action (herein "Office Action"), the specification was objected to because of a grammatical error on page 2, line 24 and a grammatical error on page 17, line 24. Claims 1-7, 10, 11, and 32-34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,061,512 to Lin et al. (herein "Lin"), in view of U.S. Patent No. 5,821,937, to Tonelli et al. (herein "Tonelli"). Claims 8, and 12-17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Lin and Tonelli and further in view of U.S. Patent No. 5,815,152, to Collier et al. (herein "Collier"). Claim 9 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Lin and Tonelli in view of U.S. Patent No. 6,353,446, to Vaughn et al. (herein "Vaughn"). Claims 18-19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Lin, Tonelli, and Collier in view of Vaughn.

II. Objections

A. Specification

In the Office Action, the disclosure was objected to because page 2, line 24 recited "interface that allows that facilitates" and page 17, line 24 recited "dedicated." To resolve this error, "interface that allows that facilitates" was changed to "interface that allows and facilitates" (page 2, line 24) and "dedicated" was changed to "dedicate" (page 17, line 24). Reconsideration of the objection is requested.

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

III. Claim Rejections

A. 35 U.S.C. § 103(a) Rejections

1. Introduction

Claims 1-7, 10, 11, and 32-34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,061,512, to Lin et al. (herein "Lin"), in view of U.S. Patent No. 5,821,937, to Tonelli et al. (herein "Tonelli"). Claims 8, and 12-17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Lin and Tonelli and further in view of U.S. Patent No. 5,815,152, to Collier et al. (herein "Collier"). Claim 9 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Lin and Tonelli in view of U.S. Patent No. 6,353,446, to Vaughn et al. (herein "Vaughn"). Claims 18-19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Lin, Tonelli, and Collier in view of Vaughn.

For the following reasons, applicants respectfully submit that the rejected claims of the present application are not obvious over the various combinations of Lin, Tonelli, Vaughn, and Collier, because the cited and applied references, either alone or in combination, fail to teach or suggest a method and system of providing a computing device control interface for centrally controlling a plurality of networked computing devices. Additionally, applicants submit that the cited references fail to teach or suggest the limitation of instructing each computing device represented by a selected graphical computing device icon to execute the instructions represented by the selected graphical action icon. Prior to discussing more detailed reasons why applicants believe that all of the claims of the present application, as amended, are allowable over the cited references, a brief description of the present invention and the cited references is presented.

a. Summary of the Present Invention

The present application is generally related to a system and method for controlling a number of computing devices, such as servers, from a central control computer by manipulating

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

a common graphical user interface ("GUI"). More particularly, the GUI generates a set of graphical icons representative of a group of computing devices within a network that will be managed and a set of graphical icons representative of computing device control parameters, or actions, that are to be executed by selected computing devices. A user of the GUI may select a computing device icon and/or an action icon and thereby implement the actions represented by the selected action icon on each of the computing devices represented by the selected computing device icons.

In one example of the present invention, a user may select several server icons (representing a group of servers) and an action icon that represents control parameters relating to the collection of performance monitoring data for the selected servers. Upon selection of the action icons for selected servers, those actions are automatically executed on each of the selected servers. In particular, the server control computer, upon receipt of a selection of servers and actions, generates and issues a template to each of the selected servers containing information to initiate the selected actions.

Thus, the present invention provides the ability to control several networked computing devices, located at geographically distinct sites, from a common location.

b. U.S. Patent No. 6,061,512, to Lin et al.

Lin is purportedly directed toward a technique for creating automated services that may be provided to telephone and computer users via a telephone network. See Lin, Col. 1, lines 6-10. The technique described in Lin utilizes an application development system, including a development tool, that makes it possible for a developer to create an automated server 105 without having to be concerned with all of the details of the protocol (e.g., ADSI) that is to be used between the automated server 105 and an expanded capability telephone network. See Lin, Col. 4, lines 53-58. An automated server 105, as described in Lin, "may be an application

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

program running on a general purpose digital computer, or alternatively may be a hard-wired (i.e., non-programmable) device." Lin, Col. 1, lines 29-32. The automated server 105 provides a service to a user of the expanded capability telephone 101. See Lin, Col. 4, lines 8-59.

In accordance with the teachings of Lin, the development tool includes software defined objects, represented by graphical interfaces, that posses distinct properties and behaviors. The graphical interfaces provide a means for an application developer to interact with the objects to develop an application for the enhanced telephone network. Examples of objects include softkey settings and screen displays for an expanded capability telephone. See Lin Col. 8, lines 26-41. The graphical interfaces of Lin are designed to allow developers to rapidly design applications for expanded capability telephones. See Lin, Col. 8, lines 45-51. As further explained in Lin, the softkeys, which may be represented as a graphical object, are action keys that users of an application may press to perform an action predefined by the application. The development tool allows developers to assign attributes to the softkeys, such as labeling information for conveying the meaning of the softkeys to the users. See Lin, Col. 9, lines 13-17.

Lin fails to teach or suggest that networked computing devices are represented by graphical computing device icons. Lin also fails to teach or suggest instructing each computing device represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon.

c. U.S. Patent No. 5,821,937, to Tonelli

Tonelli is purportedly directed to a method for updating a network design. Generally, the method includes auditing a network to discover a present network configuration, creating a network design sheet from the discovered network configuration, and placing device icons representing intelligent device objects on the network design sheet. See Tonelli, Abstract. Tonelli describes generating a network design sheet representative of a network based upon a

configuration discovered during an audit of the network, and placing device icons representing network objects on the network design sheet. The network design sheet is used to maintain information about an existing network and to modify the network on the design sheet prior to actually modifying the network.

Tonelli fails to teach or suggest a method for centrally controlling a plurality of networked computing device. Tonelli also fails to teach or suggest instructing a networked computing device to execute instructions.

d. U.S. Patent No. 5,815,152, to Collier

Collier is purportedly directed toward a method and apparatus for graphically defining a rule to be evaluated by a computer system. See Collier, Col. 1, lines 9-11. As described in Collier, "[a] rule is a set of criteria that is enforced in a case. A case is an individual instance of work to be performed for a business purpose-a collection of information organized by folder, documents, and forms." Collier, Col. 1, lines 17-20. Rules are assigned to workflow systems, such as a project management system or tracking system. See Collier, Col. 3, lines 24-31. The rules each contain one or more conditions which evaluate to one of several values, such as True or False. Actions for a rule are defined based on the result of the condition. See Collier, Col. 3, lines 45-54. Although, a user is allowed to create multiple rules (See Collier, Col. 4, line 66), each rule icon only represents a single rule with an associated rule name and rule description. See Collier, Col. 5, lines 6-16.

Collier fails to teach or suggest a method for centrally controlling a plurality of networked computing devices. Collier also fails to teach displaying a group of actions as an action icon and displaying a group of networked computing devices as a computing device icon on the display as described in Claim 12.

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

2. The Claims Distinguished

a. Claims 1 and 12

For purposes of this discussion, Claims 1 and 12 will be discussed together because the limitations discussed herein are similar for each claim. Claim 1 reads as follows:

> A method of providing a computing device control interface for centrally controlling a plurality of networked computing devices, the method comprising:
> displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by a computing device;
> displaying a set of graphical computing device icons wherein each graphical computing device icon is representative of one or more networked computing devices;
> obtaining a selection of a graphical action icon;
> obtaining a selection of a graphical computing device icon; and
> instructing each networked computing device represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon.

Similarly, Claim 12 reads as follows:

> In a computer system having a display and at least one graphical user interface selection device, a method of providing a server control interface for centrally controlling a plurality of computing devices, the method comprising:
> obtaining an identification of a group of actions to be executed by a plurality of networked computing devices;
> displaying the group of actions as an action icon on the display;
> obtaining an identification of a group of networked computing devices to be controlled;
> displaying the group of networked computing devices as a computing device icon on the display;
> obtaining a selection of the action icon by the selection device; and
> instructing each networked computing device represented by the computing device icon to execute the groups of actions represented by the action icon upon a selection of the computing device icon with the user interface device.

As recited above, Claims 1 and 12, describe a method and system for "providing a computing device control interface for centrally controlling a plurality of networked computing devices." Further, Claims 1 and 12 include the limitations of: "instructing each networked

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

computing device represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon;" and "instructing each networked computing device represented by the computing device icon to execute the groups of actions represented by the action icon upon a selection of the computing device icon with the user interface device," respectively. The control interface of Claims 1 and 12 provides the ability for a network administrator to perform actions on several computing devices on the network from a central location, without having to manually go to each computing device and perform the actions. In particular, the interface provides the ability for a user (administrator) to select several computing devices, such as servers, on the network, each being represented by a computing device icon, and assign actions to each of the selected computing devices. Those actions are then automatically executed by the selected computing devices. Thus, the method and system of Claims 1 and 12 provide the ability to easily maintain consistency and control of an entire network of computing devices, regardless of size and/or location, from a central location.

The Office Action asserts that "Lin teaches in fig. 4 a development system (administrator's console 205) that monitors channel status and process errors." Office Action, p. 2. Further, the Office Action admits that Lin "does not teach a server represented by a graphical computing device icon." *Id.* Additionally, with respect to Claim 12, the Office Action admits that Lin does not teach displaying a group of actions as an action icon and a group of computing devices as a computing device icon on the display, and instructing each computing device represented by the computing device icon to execute the group of actions represented by the action icon. *Id.* at p. 10.

However, the Office Action asserts that Tonelli resolves the first deficiency by describing device icons that represent intelligent device objects of a network. *Id.* at p. 6. The Office Action also asserts that Collier solves the second deficiency by describing a condition leg, which may

have a series of action objects and that a user may create multiple rules, which are represented by a single icon. *Id.* at p. 10. Therefore, the Office Action asserts that the combination of Lin and Tonelli (and Lin and Tonelli and Collier) would have been obvious to one with ordinary skill in the art at the time the invention was made to modify Lin's interface to include Tonelli's (and Collier's) teachings. *Id.* at 6-7.

In contrast to Claims 1 and 12, Lin, Tonelli, and Collier do not describe a method for providing a computing device control interface for centrally controlling a plurality of networked computing devices. Referring first to Lin, an application development system is described for graphically developing applications for use in an expanded capability telephone network. In particular, Lin states that:

> The invention provides a development platform that makes it possible for a developer to create an automated server 105 without having to be concerned with all of the details of the protocol (e.g., ADSI) that is to be used between the automated server 105 and the expanded capability telephone network.

Lin, Col. 4, lines 53-58. The "automated server," as described in Lin, is an application program running on a general purpose digital computer, or alternatively may be a hard-wired (i.e., non-programmable) device. See Lin, Col. 1, lines 26-33. Because the development system described in Lin is directed toward providing a platform that allows a developer to create an automated server (i.e., an application program), there is no "computing device control interface for centrally controlling a plurality of computing devices." Additionally, there is no mention in Lin of instructing each networked computing device represented by a selected graphical computing device icon to execute the instructions represented by the selected graphical action icon. Instead, as mentioned above, Lin is directed toward a development system for use in developing application programs for an expanded capability telephone network. The

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

development interface does not provide a central control for several networked computing devices.

With specific reference to Lin, applicants assert that the administrator's console 205 is only a part of the development system, as shown in Fig. 2 of Lin. In fact, Fig. 2 of Lin shows that the administrator's console 205 is not connected to the development tool 209 or the script interpreter 207. Specifically, Lin teaches that "[t]he function of the script interpreter is to receive a script file (e.g., from a development tool 209), and interpret it, line by line, to generate control signals for controlling the operation of the runtime engine 203." *See* Lin, Col. 5, lines 28-33. Accordingly, the control signals that control the runtime engine do not originate at the administrator's console, but originate at the development tool or script interpreter. *See* Lin, Col. 5, lines 28-33. Clearly, Lin does not teach that the development tool or script interpreter centrally controls a plurality of networked computing devices. Therefore, applicant asserts that Lin does not teach an interface for centrally controlling a plurality of networked computing devices as described in Claims 1 and 12.

Tonelli, also in contrast to Claims 1 and 12 of the present invention, is directed toward a method for updating a network design. As described in Tonelli, a network design sheet representing a network is developed to allow a user to maintain information about an existing network and to modify the existing network on the design sheet prior to actually modifying the network. In particular, Tonelli states that:

> During the network design session, information necessary to build the network is logged in a workorder log and a Bill of Material (BOM) log which may be viewed by selecting a View Workorder Log option 43 (Fig. 3b) or a View Bill of Materials option 45 from a workorder menu 44.

Tonelli, Col. 5, lines 40- 44. There is no discussion in Tonelli of providing a control interface for centrally controlling a plurality of networked computing devices. In contrast, Tonelli

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

describes an interface for designing/modifying a network on a design sheet prior to actually modifying the network.

Applicants assert that Tonelli, like Lin, fails to teach a method of providing a computing device control interface for centrally controlling a plurality of networked computing devices. Tonelli is limited to a network design tool that allows a user to design a network on a design sheet prior to actually modifying the network.

Collier also fails to teach each of the limitations of Claims 1 and 12. Collier is directed to a method and apparatus for graphically designing and displaying a rule to be evaluated by a workflow system for determining actions to be taken by the system when processing a particular occurrence of a system entity. While the Office Action does acknowledge that Lin and Tonelli fail to teach instructing each computing device represented by the computing device icon to execute the group of actions represented by the action icon, the Office Action does not assert that Collier satisfies this deficiency. The Office Action only asserts that:

> Collier teaches a condition leg, which may have a series of action objects (Col. 7, lines 22-35). Collier teaches that the user may create multiple rules, which are represented by a single icon (Col. 3, lines 42-54; Col. 4, lines 55-67); can add more conditions to a rule (Col. 5, lines 17-34; Col. 7, lines 7-8, 22-40).

Office Action, p. 9.

Applicants assert that the limitation of instructing each computing device to execute a group of actions is not disclosed in Collier. Collier is limited to a method for graphically displaying and defining a rule to be evaluated by a workflow system. There is no discussion in Collier of a computing device control interface for centrally controlling a plurality of networked computing devices. Likewise Collier does not teach or suggest instructing each computing device represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon.

Collier teaches that each rule icon only represents a single rule with an associated rule name and rule description. *See* Collier, Col. 5, lines 6-16. Because each rule icon corresponds to a single rule, instantiation of multiple rules requires manipulation of multiple icons. Therefore, applicants assert that Collier does not teach Claim 12's limitations of "displaying the group of actions as an action icon on the display" or "displaying the group of networked computing devices as a computing device icon on the display."

Generally described, under 35 U.S.C. § 103(a), a *prima facie* case of obviousness can be established only if the cited references, alone or in combination, teach each and every element recited in the claim. *In re Bell*, 991 F2d 781 (Fed. Cir. 1993). Lin, Tonelli, and Collier, alone or in combination, fail to teach or suggest: (1) a control interface for centrally controlling a plurality of networked computing devices; or (2) instructing each networked computing device represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon via a single manipulation of the computing device control interface.

For the above reasons, applicants respectfully request withdrawal of the § 103 rejection of Claims 1 and 12.

b. Claim 6

Claim 6 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Lin in view of Tonelli. Claim 6 is dependent upon Claim 1. As discussed above, Lin and Tonelli (as well as Collier) fail to teach or suggest each of the limitations recited in Claim 1. Accordingly, for the above-mentioned reasons, Claim 6 is likewise allowable over the combination of Lin and Tonelli (and Collier). In addition, Claim 6 further adds the following limitation:

> wherein at least one graphical action icon in the set of graphical action icons implements a collection template for capacity planning in the one or more

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

networked computing devices represented by the selected graphical computing device icon.

The Office Action asserts that Lin teaches this limitation because Lin describes that "each application to be developed is organized as an 'application project' (project = planning) that is a collection of object instances that together describe the resources used by an application during development and that the application developer can use the graphical user interface to invoke a test run (capacity, performance, etc.) of the screen files that have been created." Office Action, p. 8. Additionally, the Office Action asserts that the limitation of Claim 6 is taught by Lin because in Lin an application developer can use the graphical user interface to invoke a test run (capacity, performance, etc.) of the screen files that have been created. *Id.* In support of the positions, the Office Action cites column 10, lines 29-32, column 12, lines 43-46, and column 12, lines 19-28 of Lin as teaching the limitation recited in Claim 6. *Id.*

However, the cited sections of Lin, or any other portion of Lin, do not disclose or teach the limitation of Claim 6. As discussed above, the graphical action icons represent actions that are to be executed by each computing device represented by the selected graphical computing device icon. As recited in Claim 6, one of those actions is implementing a collection template for capacity planning. Instructing a networked computing device to implement a collection template for capacity planning is distinct from test running an application program designed by a developer, as described in Lin.

As discussed above, Lin is limited to an application development tool that may be used by a developer to design application programs for an expanded capability telephone network. Lin does not discuss or describe wherein at least one graphical action icon in the set of graphical action icons implements a collection template for capacity planning in the one or more networked computing devices represented by the selected graphical computing device icon.

Thus, in addition to the reasons presented with respect to Claim 1, applicants respectfully request withdrawal of the § 103 rejection of Claim 6.

c. Claims 2-5, and 7-11

Claims 2-5, and 7-11 are dependent on Claim 1. As discussed above, Lin and Tonelli fail to teach or suggest each of the limitations recited in Claim 1. Accordingly, for the above-mentioned reasons, Claims 2-5, and 7-11 are likewise allowable over the combination of Lin and Tonelli. In addition, Claims 2-5, and 7-11 further add to the nonobviousness of the claims.

d. Claims 13-19

Claims 13-19 are dependent on Claim 12. As discussed above, Lin, Tonelli, and Collier fail to teach or suggest each of the limitations recited in Claim 12. Accordingly, for the above-mentioned reasons, Claims 13-19 are likewise allowable over the combination of Lin, Tonelli, and Collier. In addition, Claims 13-19 further add to the nonobviousness of the claims.

e. Claims 32-34

Claims 32-34 include limitations that are similar to, but narrower than, the limitations recited in Claims 1-3. Additionally, independent Claim 32 includes an additional limitation similar to the limitation discussed above with respect to Claim 6. Accordingly, for at least the same reasons discussed with regard to Claims 1-3, and 6, applicants assert that the claims are not rendered obvious in light of the cited references. Applicants request an acceptance of Claims 32-34.

CONCLUSION

Based on the above-referenced arguments and amendments, applicants respectfully submit that all of the pending claims of the present application, Claims 1-19 and 32-34, are allowable over the cited and applied references. Because the cited and applied references fail to teach a computing device control interface for centrally controlling a plurality of computing

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

devices, and also fail to teach or suggest instructing the networked computing devices represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon, applicants respectfully request withdrawal of the rejections of the claims and allowance of the present application.

If any questions remain, applicants request that the Examiner contact the undersigned at the telephone number listed below.

Respectfully submitted,

CHRISTENSEN O'CONNOR
JOHNSON KINDNESS[PLLC]

Mauricio A. Uribe
Registration No. 46,206
Direct Dial No. 206.695.1728

I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed envelope as first class mail with postage thereon fully prepaid and addressed to Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the below date.

Date: 9/22/05

MAU:jlb

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS[PLLC]
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100